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July 31, 2008

VIA TELECOPY ONLY
(212-805-6326)

Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 640
New York, NY 10007

MEMO ENDORSED



Re: Park Avenue Consulting Group v. Newgold, Inc., et al.
08 Civ. 1850 (CM) (GWG)

Dear Judge McMahon:

Please accept this letter as a joint request for an adjournment/extension of time with respect to the above matter. The parties are requesting an additional sixty (60) days be added to the remaining time periods set forth in the Civil Case Management Plan entered by Your Honor on April 1, 2008.

In accordance with Rule 1(E) of Your Honor's Individual Practices, a proposed Revised Scheduling Order is enclosed. In addition, the following information is provided:

(1) Original Dates:

(a) Completion of Discovery	August 29, 2008
(b) Plaintiff's Expert Report	July 31, 2008
(c) Defendants' Expert Report	August 15, 2008
(d) Joint pre-trial order	October 14, 2008

(2) No previous requests for an adjournment or extension have been made by either party.

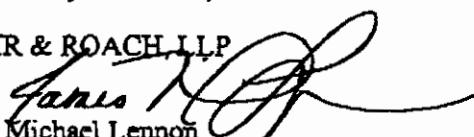
(3) N/A.

(4) This is a joint request for an extension of time. Both parties consent to the requested extension.

Thank you for your consideration.

Respectfully submitted,

BLAIR & ROACH LLP

By: 
J. Michael Lennon

JML:tn
Enclosure
cc: David F. Filler, Esq. (via telecopy only 718-340-3615)

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